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STATE OF FLORIDA



DIVISION OF REGULATORY ANALYSIS  
BETH W. SALAK  
DIRECTOR  
(850) 413-6600

# Public Service Commission

April 26, 2010

Mr. Jahan J. Babadi, President  
Sun-Tel USA, Inc.  
5921-2 University Blvd. W.  
Jacksonville, FL 32216

RECEIVED-FPSC  
10 APR 29 PM 1:06  
COMMISSION  
CLERK

**Re: Docket No. 100124-TX - Application for designation as an Eligible Telecommunications Carrier (ETC) by Sun-Tel USA, Inc. (Sun-Tel)**

Dear Mr. Babadi:

Staff is seeking additional information regarding Sun-Tel's application for ETC designation. Please provide a written response to each of the questions in the enclosed data request on or before May 24, 2010.

Your company may avail itself of the statutory confidential provisions of Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, if it believes it is necessary to comply with this data request.

If you have questions, please contact Curtis Williams at (850) 413-6924 or Bob Casey at (850) 413-6974. Thank You.

Sincerely,

A handwritten signature in black ink that reads "Beth Salak".

Beth Salak  
Director

BWS/cjw  
Enclosure

cc: Division of Regulatory Analysis (Williams, Casey)  
Office of General Counsel (L. Tan)  
Docket No. 100124-TX

DOCUMENT NUMBER DATE  
03495 APR 29 2010  
FPSC-COMMISSIONER OFFICE

## General Data Requests for Docket No. 100124-TX

1. Does Sun-Tel provide Lifeline service in any other state? If so, please list the state and whether this service is provided through a wholesale local platform or through resale. In addition, have any of these state utility commissions received any complaints concerning Sun-Tel service in that state? If so, please describe.
2. Has Sun-Tel been granted or denied ETC status in any other state? If so, please list the state and docket number in which ETC status was granted or denied. Has Sun-Tel filed for ETC status in any state and subsequently withdrawn the petition? If so, please list the state and docket number.
3. According to 47 C.F.R. 54.201(d)(1), a company must offer the services that are supported by federal universal service support mechanisms either using its own facilities or a combination of its own facilities and resale of another carrier's services. Please provide any resale or commercial agreements you currently have in Florida with other telecommunications carriers or signed evidence of the agreements.
4. What facilities, planned or existing, does Sun-Tel have in Florida in order to serve Florida customers?
5. How many Florida residential and commercial customers does Sun-Tel presently serve? Please provide both the number of residential and business customers and the number served through UNEs and the number served through resale.
6. Please provide examples of how Sun-Tel advertises or will advertise, using media of general distribution, the availability of the supported services and what the charges are for these services.
7. Does Sun-Tel provide service to its customers via a prepaid service? If so, what percentage of its customers receive their service via a prepaid service?
8. What is the average customer bill for a Sun-Tel residential telephone customer? In your response, please include the jurisdictions that this information is obtained from, and if there are variances in the bills pertaining to Florida customers, delineate those differences.
9. As a condition of receiving local service, are Sun-Tel residential customers required to subscribe to Sun-Tel long-distance services?
10. If Sun-Tel receives an ETC designation in Florida, approximately how long will it take for Sun-Tel to offer Lifeline service in the area in which it receives the ETC designation? Please elaborate on any extended or special circumstances.

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11. Describe Sun-Tel's local usage plans pursuant to 47 C.F.R. 54.101(a)(2). If phone service is offered in a bundled package, please describe and enumerate the wireline local component (charge for local phone service) for which universal service compensation would be based on?
12. Describe the access Sun-Tel plans to provide to emergency services, such as 911 and enhanced 911 as defined in 47 C.F.R. 54.101(a)(5).
13. Do Sun-Tel's customers have access to competitive directory assistance providers, as defined as by 47 C.F.R. 54.101(a)(8).
14. Describe the toll-limitation features of Sun-Tel. See 47 C.F.R. 54.101(a)(9).
15. According to 47 C.F.R. 54.101(c):

A state commission may grant the Application of a telecommunications carrier that is otherwise eligible to receive universal service support under Sec. 54.201, if the party is requesting additional time to complete the network upgrades needed to provide single-party service, access to enhanced 911 service, or toll limitation. If such Application is granted, the otherwise eligible communications carrier will be permitted to receive universal service support for the duration of the period designated by the state commission.

If you will be making such a request, what time frame will be necessary for Sun-Tel to accomplish these network upgrades? Please include in your response all areas for which you are seeking ETC designation.

16. Does Sun-Tel have any outstanding complaints at the Federal Communications Commission? If yes, please provide a synopsis of these complaints.
17. Please provide a Certification attesting to the best of your knowledge, information and belief, all statements of fact contained in the request are correct statements of the business and affairs of the requesting carrier with respect to each and every matter set forth in this request.
18. Does Sun-Tel understand that any resold Lifeline, Link-Up, or TLS service purchased through another carrier cannot be claimed by Sun-Tel as access lines eligible for reimbursement from USAC?
19. Please provide Sun-Tel's corporate structure.
20. Please provide a list of Sun-Tel's owners or corporate officers and indicate if any are also owners, corporate officers, or employees of any other Telecommunications Companies.

21. Will Sun-Tel seek TLS reimbursement from USAC if granted ETC status? If yes, provide a detailed list of the incremental costs it will be claiming.
22. Will Sun-Tel seek Link-Up reimbursement from USAC if granted ETC status? If yes, list the amount per customer Sun-Tel would be claiming.
23. Will Sun-Tel seek Lifeline reimbursement from USAC if granted ETC status? If yes, list the amount per customer Sun-Tel would be claiming.
24. Does Sun-Tel provide service to customers using bundled packages? If so, will Sun-Tel provide the \$13.50 Lifeline discount to any bundle a customer chooses?
25. Does Sun-Tel understand that Florida ETCs provide a non-reimbursable \$3.50 credit per month to each Lifeline customer's bill in addition to the Federal \$10.00 reimbursement credit?
26. Does Sun-Tel understand that Florida's Lifeline program provides that if a Lifeline customer is no longer eligible for Lifeline, the ETC must provide a 30% monthly discount off its local rate to that customer for a period of 12 months at the ETCs expense?
27. Please provide Sun-Tel's purpose for requesting ETC status in Florida. What does the company hope to achieve? Why not just purchase resale Lifeline access lines from your underlying carrier if the purpose of ETC designation is solely to provide Lifeline and Link-Up?
28. How many residential and business customers does Sun-Tel have in Florida?
29. Is Sun-Tel currently providing Lifeline service in Florida to consumers using resold access lines from its underlying carrier? If so, how many Lifeline customers are being served?
30. Will Sun-Tel be using any type of VoIP service to provide service to Lifeline customers?
31. Does Sun-Tel provide wireless services to customers? If so, does Sun-Tel plan on offering wireless services to Lifeline customers?
32. Please provide Sun-Tel's most current financial statements including Balance Sheet and Profit and Loss Statements. Please indicate who prepared the statements.
33. Please provide copies of all Federal and State of Florida income tax and/or corporate filings made on behalf of Sun-Tel for the last three years.
34. Has Sun-Tel or any owners, officers, or managers of Sun-Tel been involved in any bankruptcy proceedings? If so, please provide details as to who, when, and where the bankruptcy occurred.

35. Have any owners, officers, or managers of Sun-Tel been charged or convicted of a criminal offense? If so, please provide details as to who, when, and where the charges or convictions occurred.
36. Please identify all civil litigation in which a Sun-Tel owner, officer, or manager has been deposed or has been a plaintiff, a defendant, or a witness.
37. Please provide the physical location of Sun-Tel's books and records, along with the days and times these books and records are available for examination.
38. Please provide a list of any companies which Sun-Tel will be contracting with to provide services to Lifeline customers. List each company and what service(s) it provides.